

Windows Privacy Update

Jeffrey Friedberg
Director of Windows Privacy



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Agenda

- Revisit Goals
- MPS V2
- New Privacy Process and Tools
- SDL Integration Timing
- Q & A

Goals

- Ensure Longhorn meets privacy bar
 - Drive Privacy “Basic”
- Integrate Privacy and SDL
 - Piggyback on SDL “mandate”
 - Identify privacy rules, process, guidance, and work flow
 - Dovetail and deploy

Goals

- Ensure Longhorn meets privacy bar
 - Drive Privacy “Basic”
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MPS Changes

- Tightened definitions and rules, removed process
- Added “rules table” for clarity and to avoid gaps
- Clarified flavors of consent
- Added variants of anonymous
 - Continuous Monitoring
 - “Essential” Collection
- Addressed “hidden PII”
- Added scenario for children

MPS Result

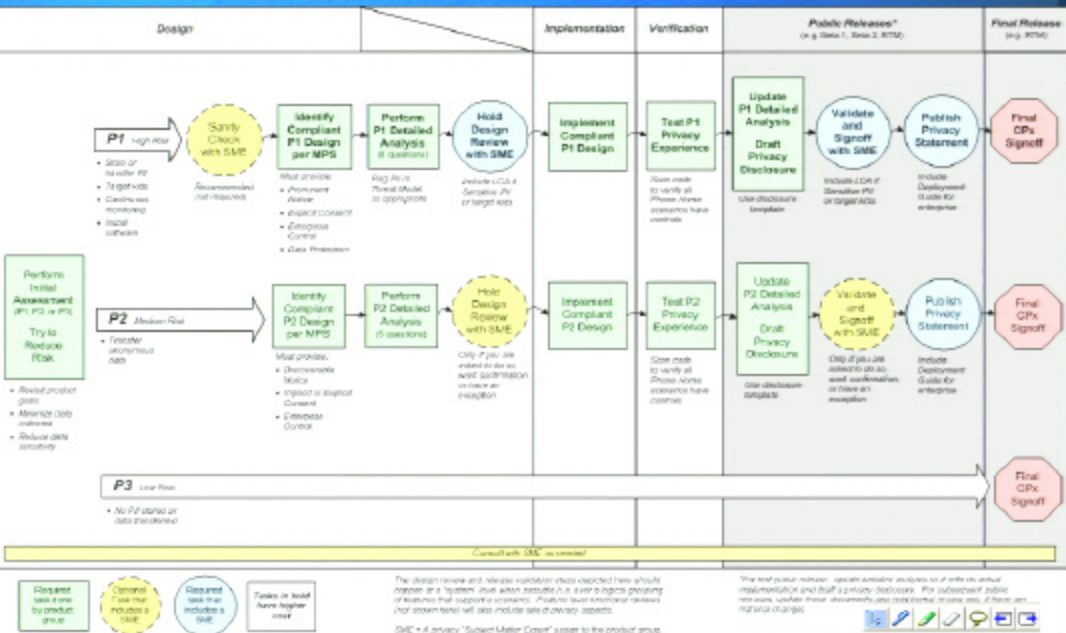
- Solid foundation
- Better coverage
- Clearer consensus
 - Windows, Office, MSN, LCA, CPG, PSS, ...

New Process

- Cannot afford “one size fits all”
- Need to make cost proportional to privacy risk
 - Higher risk – more cost
 - Lower risk – less cost
- Sort behaviors by risk

| | | |
|----------------------------|--------------------|---------------------------|
| Target Kids | <i>Very High</i> | <i>COPPA</i> |
| Transfer Sensitive PII | <i>Very High</i> | <i>GLBA, HIPAA</i> |
| Transfer Non-Sensitive PII | <i>High</i> | <i>EU / FTC</i> |
| Modify System | <i>High</i> | <i>CFAA</i> |
| Continuous Monitoring | <i>Medium High</i> | <i>Deployment Blocker</i> |
| Anonymous Transfer | <i>Medium</i> | <i>Deployment Blocker</i> |

Optimized Privacy Process



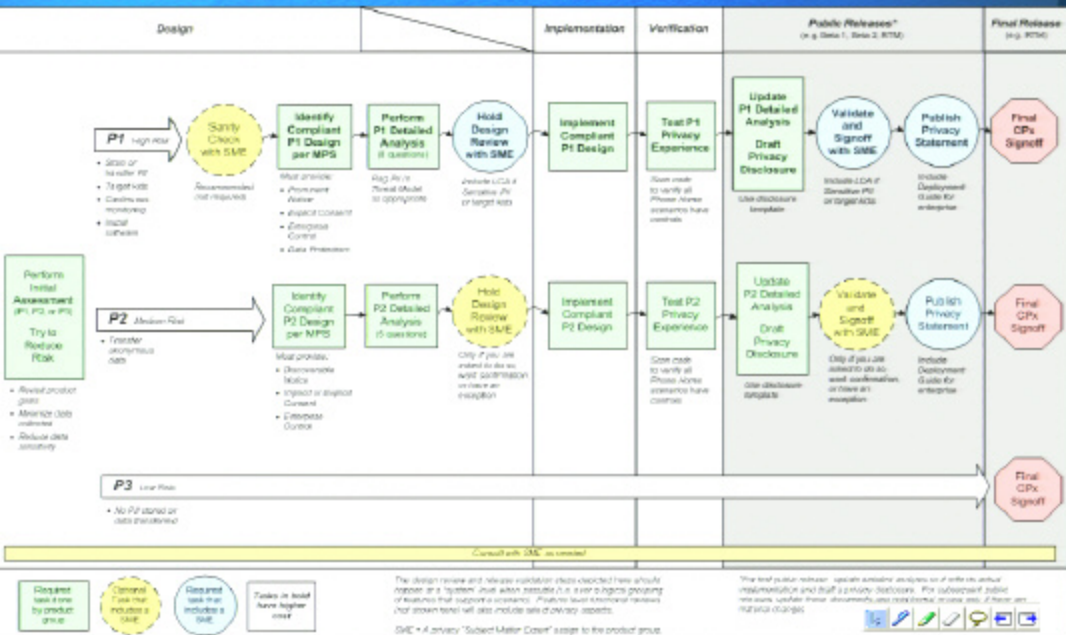
New Tools

- **Initial Assessment**
 - New scenarios, better instructions
- **Detailed Analysis**
 - More relevant, much easier to complete
- **Privacy Disclosure Template**
 - Draft “customer ready” language
- **MPS Cookbook**
 - Scenarios, rules, guidance, examples
- **MPS Companion**
 - Optimal work flow, end to end

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Integration Timing

- SDU on 6 month refresh cycle
- Looked at March deadline
- Responding: "Take your time and get it right"
- Will deploy first with Longhorn
 - Integrate MPS and tool into the beta
- Jump on the next SDU train
- Download process refresh tool

Longhorn Exit Criteria

- Highly refined end of life operations
- Multiple beta-ready exit scenarios (e.g. privacy team) (and weapons (aka measurable metrics))
 - Impact metrics available
 - Definition of metrics available
 - Criteria document created
 - Exit metrics documented
 - Working on this now
 - Criteria document created
- Split PI into two risk classes: 10/11

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March 3, 2008

Microsoft Confidential

Click to add notes



Slides

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Longhorn Exit Criteria

- Highly refined end of life operations
- Multiple beta deployment resources (e.g. privacy team) tool weapons (i.e. measurable feedback)
- Responsive service to
 - Customer change requests
 - Tool bugs and issues
 - Customer feedback
 - Customer change requests
- Working partnership with the
 - Customer and vendor
 - Customer and vendor
- Split PI into two risk classes: 10/11

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March 3, 2006

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TCAAB 03-02-2005

TCAAB 03-02-2005



The MPS Companion

Your step by step guide for creating [MPS](#) compliant software products

Introduction

This InfoPath form offers one stop shopping for privacy compliance. It is a living document that tracks the privacy aspects of your software from design through release. It covers the relevant MPS rules and guidance for specific behaviors that impact privacy. The form has been optimized so you only have to see and perform the steps that apply to your software's behavior.

1) Identify Your Software and Key Privacy Contacts

What is the name of the product that will include your software?

Longhorn

What is the name and version of your software?

Enter internal name here (e.g. Automatic Update 1.0)

Who on your team is responsible for privacy?

Enter one or more email aliases here

2) Perform an Initial Assessment

The Initial Assessment is a quick way to determine your "Privacy Impact Rating" and estimate the work that will be required to deliver a compliant implementation. The rating (P1, P2, or P3) is a measure of how risky your software is from a privacy perspective and is used to streamline the privacy process. You will only need to complete steps that apply to your rating (and level of risk). The best time to complete the Initial Assessment is early in the product planning / requirements phase — before detailed specifications are authored and code is

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Determine your Privacy Impact Rating

Check all behaviors that apply to your software (if your software does not exhibit any of the behaviors, check "None of the above"):

☐ Store PII on the user's system or transfer PII to Microsoft or a third party

[Click here to learn about this behavior](#)

☐ Provide an experience that targets children or is attractive to children

[Click here to learn about this behavior](#)

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Transfer PII to Microsoft or a third party

(The Wrong Way)

- Note that no value proposition is given. User is instructed to just complete the form
- Users are not told how to change this information later – and no link to any further information is provided
- A prominent link to the Privacy Statement is provided at the top, and a link is also in the footer, however this is not enough – the value proposition and additional information should be provided as well.

Modifying System State

- Describes a compelling customer value proposition to allow system state modifications automatically.
- Provide prominent notice thru links to more info (*How does Automatic Updates work?*), see *Modifying System State – More Info* below.
- Explicit consent gained through multiple radio buttons that allow for a varied amount of customer interaction and trust with the service provided.

System Properties

| | | | |
|---------|---------------|----------|----------|
| General | Computer Name | Hardware | Advanced |
|---------|---------------|----------|----------|

| | | |
|----------------|-------------------|--------|
| System Restore | Automatic Updates | Remote |
|----------------|-------------------|--------|



Windows can regularly check for important updates and install them for you. (Turning on Automatic Updates may automatically update Windows Update software first, before any other updates.)

How does Automatic Updates work?

☒ Automatic (recommended)

Automatically download recommended updates for my computer and install them.

Every day at 12:00 PM

☐ Download updates for me, but let me choose when to install them☐ Notify me but don't automatically download or install them.

Turn off Automatic Updates



Your computer will be more vulnerable unless you install updates regularly.

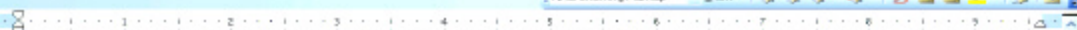
Install updates from the [Windows Update Web site](#)

Modifying System State

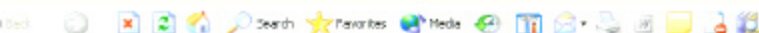
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Modifying System State - More Info

- Provides prominent notice thru a link to more information on AU
- Also provides a link to the privacy statement from within this help page.



http://team/sites/privtools/MP5_Cookbook.doc

Go Link

Final Showing Markup



Page: 7

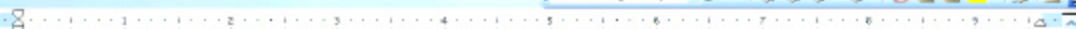
Continuous Monitoring

- The value proposition explains clearly to users what will and, more importantly in this case, will not be done, and why it's to their benefit.
- Explicit consent is achieved via the user selecting the radio button they prefer.
- (see Continuous Monitoring – Read [More](#), below.
- A prominent link is provided to more information (see Continuous Monitoring – Read [More](#), below.



http://team/sites/privtools/WPS_Cookbook.doc

Final Showing Markup



The usage information is completely anonymous and Microsoft uses innovative security technologies to help protect your safety and security. We will not collect your name, address, or any other personally identifiable information in connection with this usage information.

Please note that this choice does not affect the collection of anonymous performance information about the MSN software and service that Microsoft collects as a essential part of providing you and all MSN customers a reliable, quality service.

Read more about the performance information Microsoft collects

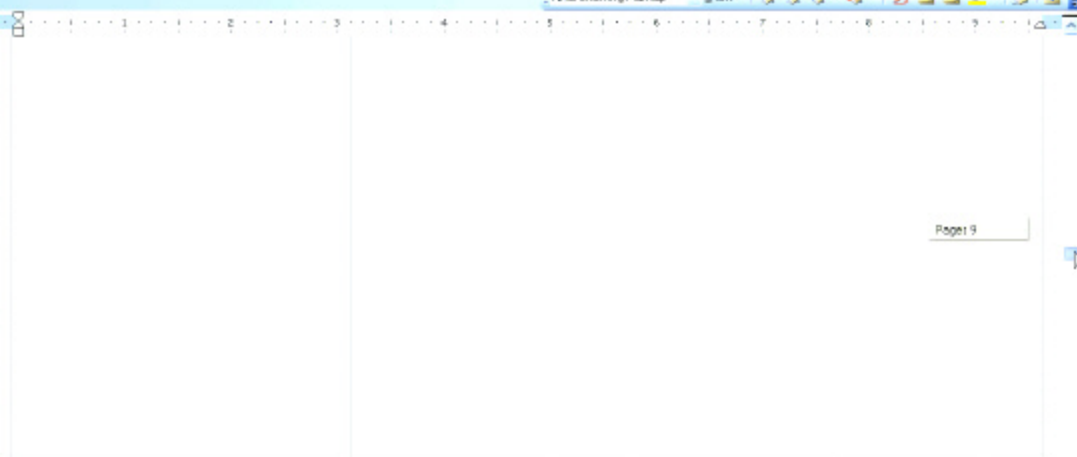
- ☐ Join the Customer Experience Improvement Program
- ☐ Do not join the Customer Experience Improvement Program



http://team/sites/privtools/WPS_Cookbook.doc

Go Link

Final Showing Markup



Page 9



msn Help - MSN Explorer



Performance data collected by HSH

MSN collects the following performance information about MSN software and services. All of this information is collected anonymously.

Session length

Processor speed

Processor type

Operating system

Used to measure whether there is a difference in performance between different operating systems.

Screen resolution

Screen depth

MSN Internet Software version (major)

MSN Internet Software version (minor)

MSN Internet Software installation:

type

Used to determine if MSN Explorer is a production, beta, or internal build. Helps isolate issues to a particular

[Continuous Monitoring - Read More](#)

- A prominent link was provided on the page above to this help topic. Every item of data collected through this program is listed and clearly explained to the user.

☒ Yes, I am willing to participate anonymously in the Customer Experience Improvement Program. (Recommended)

☐ No, I don't wish to participate.

[Read more about the Customer Experience Improvement Program](#)

To contact Microsoft Product Support Services or to make a suggestion to improve Office, click Contact Us on the Help menu.

OK

Cancel

Transfer Anonymous Data to Microsoft or a Third Party

This scenario involves discrete "User-Initiated" collection and transfer of Anonymous Data. Examples: Cookie with anonymous tracking ID sent to a web site when user clicks on a hyperlink, using a Microsoft or third-party web service.

| Rule | Guidance |
|--|--|
| <ul style="list-style-type: none"> Must get implicit (or explicit) consent from user prior to transfer and provide Discoverable Notice. | <ul style="list-style-type: none"> See "How to Get Implicit Consent" Use of web services must be documented in a discoverable privacy statement. Features that display web content (e.g. web page or banner) do not need to be documented in the privacy statement if: <ul style="list-style-type: none"> The user is provided an implicit consent experience which allows them to infer that the Internet will be accessed (e.g. a labeled button that says "Get Help Online" or "Get Stock |

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Form1 - Microsoft Office InfoPath 2003

File Edit View Insert Format Tools Table Help

Start Link Entry

In general, features that "phone home" must provide a Group Policy control that administrators can set to enable or disable the feature. Also, features that use web services need to be disclosed (e.g. in the privacy statement).

Sanity check your plans with SME

If you were unable to substantially lower your risk and your rating remains P1, it's prudent to have a Privacy SME review your plans before you invest in a detailed design. While this step is not a hard requirement, it is strongly recommended. They will be able to help you ensure compliance and can offer other alternatives that could reduce risk.

3) Identify a Compliant Design

[MPS](#) is the definitive reference for privacy requirements. To help you realize a detailed design that fulfills these requirements, a summary of the [MPS rules](#), along with prescriptive guidance and examples, is available in the [MPS Cookbook](#). If you need advice or help understanding the rules or guidance, contact your Privacy SME.

4) Perform a Detailed Privacy Analysis

Prior to your privacy design review, flag any PII you store or transfer in your threat model and summarize the privacy aspects of your software in a Detailed Analysis. The original version of the Detailed Analysis that was released contained over 50 questions and went into a very fine level of detail. The new version of the Detail Analysis contained in this form asks just a handful of general questions and is much easier to complete. While it's recommended you complete the new detailed analysis, if you already completed the older Detailed Analysis, and you believe it accurately reflects your software's behavior, you do not need to complete the new Detailed Analysis.

- ☐ I completed the older Detailed Analysis and it's still valid
- ☐ I'd like to complete the new Detailed Analysis (recommended)

5) Hold a Privacy Design Review with a Privacy SME

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AutoShapes

Slide 6 of 13

LCA_Summit_Template (2)

start | Taskbar with icons | 3:14 PM

Form1 - Microsoft Office InfoPath 2003

File Edit View Insert Format Tools Table Help

Type a question for help

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Slide 6 of 13 LCA_Summit_Template (2)

start

MPS... 2 ML... 2 WL... Micro... Form1...

3:14 PM



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5) Hold a Privacy Design Review with a Privacy SME

To avoid costly mistakes, you must hold a design review with your Privacy SME (and LCA if your process Sensitive PII or target children) before you invest heavily in implementation.

6) Implement Your Compliant Design

Implement a compliant design per the [MPS](#). Consult with a Privacy SME as needed. Test privacy notice, consent, and control experiences. To ensure all Phone Home scenarios are covered, scan the code for undiscovered cases.

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Describe the PII you store or data you transfer

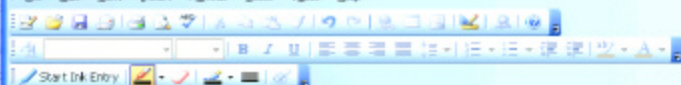
[Click here for guidance](#)

Describe your compelling customer value proposition and business justification

[Click here for guidance](#)

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Describe the PII you store or data you transfer

[Click here for guidance](#)

Describe your compelling customer value proposition and business justification

[Click here for guidance](#)

Describe your notice and consent experiences

[Click here for guidance](#)

Describe how enterprises can control your feature

[Click here for guidance](#)

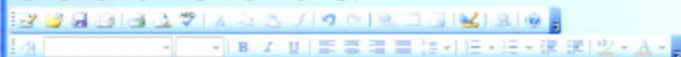
Describe how users can control your feature

[Click here for guidance](#)

Describe how users will consent to the use of their data

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Form1 - Microsoft Office InfoPath 2003

File Edit View Insert Format Tools Table Help

Type a question for help

Start Ink Entry

Describe your compelling customer value proposition and business justification
 Click here for guidance

Describe your notice and consent experiences
 Click here for guidance

Describe how enterprises can control your feature
 Click here for guidance

Describe how users can control your feature
 Click here for guidance

Describe how you will prevent unauthorized access to PII
 Click here for guidance

Form template's location: C:\Documents and Settings\jeffreyf\Desktop\TCAAB 03-02-2005\MPS_Companion_3-1-2005c.xsn



Click here for guidance

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Click here to learn about this behavior

☐ Provide an experience that targets children or is attractive to children

Click here to learn about this behavior

☐ Continuously monitor the user

Click here to learn about this behavior

☐ Install new software or change file type associations, home page, or search page

Click here to learn about this behavior

☒ Transfer anonymous data

Click here to learn about this behavior

☐ None of the above

Your overall Privacy Impact Rating is P1- high risk

Understand your obligations and try to lower your risk

Before you invest lots of time in a design or implementation, get a feel for the work it will take and investigate ways to lower your overall privacy risk. Higher risk translates to higher development and support cost.

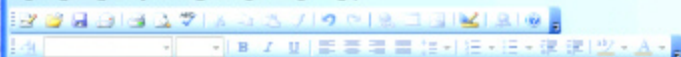
Storing or transferring PII

Processing PII (both sensitive and non-sensitive PII) brings with it substantial obligations including: (i) [prominent notice](#) and [explicit consent](#), (ii) secure methods, (iii) user control, and (iv) user access if stored at Microsoft.

It also makes users very nervous. You should only process PII if you can offer them a compelling value proposition. In general, customers are used to making deals. When a deal is not to their benefit, they can feel ripped off. Their trust for Microsoft can go down. Only collect data from the user if you can clearly explain the net benefit to them. If you are hesitant to tell the user "up front" what you

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Determine your Privacy Impact Rating

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☐ **Continuously monitor the user**

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☒ **Transfer anonymous data**

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Click here to learn about this behavior
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- ☐ **Continuously monitor the user**
Click here to learn about this behavior
- ☐ **Install new software or change file type associations, home page, or search page**
Click here to learn about this behavior
- ☒ **Transfer anonymous data**
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- ☐ **None of the above**

Your overall Privacy Impact Rating is **P1 - high risk**

File Edit View Insert Format Tools Table Help

Type a question for help

Start Ink Entry

2) Perform an Initial Assessment

The Initial Assessment is a quick way to determine your "Privacy Impact Rating" and estimate the work that will be required to deliver a compliant implementation. The rating (P1, P2, or P3) is a measure of how risky your software is from a privacy perspective and is used to streamline the privacy process. You will only need to complete steps that apply to your rating (and level of risk). The best time to complete the Initial Assessment is early in the product planning / requirements phase — before detailed specifications are authored and code is written.

Determine your Privacy Impact Rating

Check all behaviors that apply to your software (if your software does not exhibit any of the behaviors, check "None of the above"):

- ☐ *Store PII on the user's system or transfer PII to Microsoft or a third party*
Click here to learn about this behavior
- ☐ *Provide an experience that targets children or is attractive to children*
Click here to learn about this behavior
- ☐ *Continuously monitor the user*
Click here to learn about this behavior
- ☐ *Install new software or change file type associations, home page, or search page*
Click here to learn about this behavior
- ☒ *Transfer anonymous data*
Click here to learn about this behavior
- ☐ *None of the above*

Your overall Privacy Impact Rating is P2- medium risk

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4) Perform a Detailed Privacy Analysis

Prior to your privacy design review, flag any PII you store or transfer in your threat model and summarize the privacy aspects of your software in a Detailed Analysis. The original version of the Detailed Analysis that was released contained over 50 questions and went into a very fine level of detail. The new version of the Detail Analysis contained in this form asks just a handful of general questions and is much easier to complete. While it's recommended you complete the new detailed analysis, if you have already completed the older Detailed Analysis, and you believe it accurately reflects your software's behavior, you do not need to complete the new Detailed Analysis.

- ☐ I completed the older Detailed Analysis and it's still valid
- ☒ I'd like to complete the new Detailed Analysis (recommended)

Describe the anonymous data you transfer

Click here for guidance

Describe your notice and consent experiences

Click here for guidance

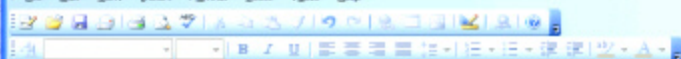
Describe how enterprises can control your feature

Click here for guidance

Describe how users can control your feature

Form template's location: C:\Documents and Settings\jeffreyf\Desktop\TCAAB 03-02-2005\MPS_Companion_3-1-2005c.xsn





Analysis, and you believe it accurately reflects your software's behavior, you do not need to complete the new Detailed Analysis.

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Describe the anonymous data you transfer

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File Edit View Insert Format Tools Table Help

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Start Ink Entry

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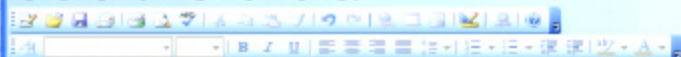
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Form template's location: C:\Documents and Settings\jeffreyf\Desktop\TCAAB-03-02-2005\MPS_Companion_3-1-2005c.xsn



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File Edit View Insert Format Tools Table Help

Type a question for help

Start Ink Entry

☐ I completed the older Detailed Analysis and it's still valid
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Describe the anonymous data you transfer
[Click here for guidance](#)

Describe your notice and consent experiences
[Click here for guidance](#)

Describe how enterprises can control your feature
[Click here for guidance](#)

Describe how users can control your feature
[Click here for guidance](#)

5) Hold a Privacy Design Review with a Privacy SME

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Describe the anonymous data you transfer

[Click here for guidance](#)

Describe your notice and consent experiences

[Click here for guidance](#)

Describe how enterprises can control your feature

[Click here for guidance](#)

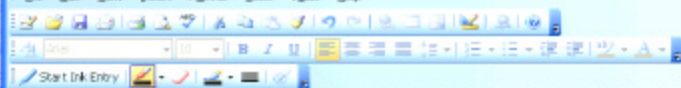
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[Click here for guidance](#)

5) Hold a Privacy Design Review with a Privacy SME

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- ☐ I completed the older Detailed Analysis and it's still valid
- ☒ I'd like to complete the new Detailed Analysis (recommended)

Describe the anonymous data you transfer

Describe what data is transferred, under what conditions the data is sent, who receives the data, and how the data will be used. For unique identifiers (e.g. GUIDs that may be contained in cookies) include their lifespan (e.g. session, login, user account, system).

Describe your notice and consent experiences

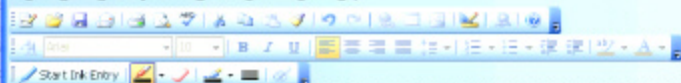
[Click here for guidance](#)

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Describe your notice and consent experiences

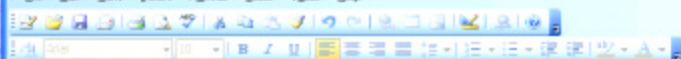
[Click here for guidance](#)

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Describe your notice and consent experiences

- ☒ Include a link to the UX (screen shot, spec, ...) and indicate when the UX will be presented (e.g. OOBE, 1st run, JIT).

Consent may be implicit or explicit.

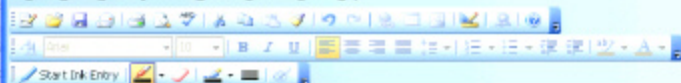
Use of web services must be documented in a discoverable privacy statement. Features that display web content (e.g. web page or banner) do not need to be documented in the privacy statement if:

- The user is provided an implicit consent experience which allows them to infer that the Internet will be accessed (e.g. a labeled button that says "Get Help Online" or "Get Stock Quotes from Schwab").
- The data transferred is solely anonymous.

Describe how enterprises can control your feature

- ☒ Click here for guidance





Describe how enterprises can control your feature

Click here for guidance

Describe how users can control your feature

Click here for guidance

5) Hold a Privacy Design Review with a Privacy SME

Before you invest heavily in your implementation, hold a design review with your Privacy SME if:

- You are asked to do so by a Privacy SME
- You want confirmation your design is compliant
- You know you are not compliant and seek an exception

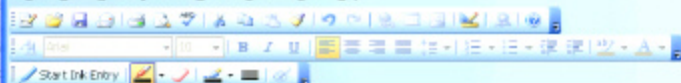
6) Implement Your Compliant Design

Implement a compliant design per the [MPS](#). Consult with a Privacy SME as needed. Test privacy notice, consent, and control experiences. To ensure all Phone Home scenarios are covered, scan the code for undiscovered cases.

7) Author a Draft Privacy Disclosure

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Describe how enterprises can control your feature

Click here for guidance

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Click here for guidance

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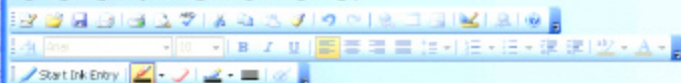
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7) Author a Draft Privacy Disclosure

The behaviors described above must be disclosed in a privacy disclosure (usually a Privacy Statement). The disclosure must be posted

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written.

Determine your Privacy Impact Rating

Check all behaviors that apply to your software (if your software does not exhibit any of the behaviors, check "None of the above").

- ☐ ***Store PII on the user's system or transfer PII to Microsoft or a third party***
Click here to learn about this behavior
- ☐ ***Provide an experience that targets children or is attractive to children***
Click here to learn about this behavior
- ☐ ***Continuously monitor the user***
Click here to learn about this behavior
- ☐ ***Install new software or change file type associations, home page, or search page***
Click here to learn about this behavior
- ☒ ***Transfer anonymous data***
Click here to learn about this behavior
- ☐ ***None of the above***

Your overall Privacy Impact Rating is P2- medium risk

Understand your obligations and try to lower your risk

Before you invest lots of time in a design or implementation, get a feel for the work it will take and investigate ways to lower your overall privacy risk. Higher risk translates to higher development and support cost.

- Click here for a summary of your obligations

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Type a question for help

Start Ink Entry

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Click here to learn about this behavior
- ☐ **None of the above**

Your overall Privacy Impact Rating is P1- high risk

Understand your obligations and try to lower your risk

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Strains or transforms PII

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Form1 - Microsoft Office InfoPath 2003

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In general, features that "phone home" must provide a Group Policy control that administrators can set to enable or disable the feature. Also, features that use web services need to be disclosed (e.g. in the privacy statement).

If you were unable to substantially lower your risk and your rating remains P1, it's prudent to have a Privacy SME review your plans before you invest in a detailed design. While this step is not a hard requirement, it is strongly recommended. They will be able to help you ensure compliance and can offer other alternatives that could reduce risk.

3) Identify a Compliant Design

[MPS](#) is the definitive reference for privacy requirements. To help you realize a detailed design that fulfills these requirements, a summary of the [MPS rules](#), along with prescriptive guidance and examples, is available in the [MPS Cookbook](#). If you need advice or help understanding the rules or guidance, contact your Privacy SME.

4) Perform a Detailed Privacy Analysis

Prior to your privacy design review, flag any PII you store or transfer in your threat model and summarize the privacy aspects of your software in a Detailed Analysis. The original version of the Detailed Analysis that was released contained over 50 questions and went into a very fine level of detail. The new version of the Detail Analysis contained in this form asks just a handful of general questions and is much easier to complete. While it's recommended you complete the new detailed analysis, if you already completed the older Detailed Analysis, and you believe it accurately reflects your software's behavior, you do not need to complete the new Detailed Analysis.

☐ I completed the older Detailed Analysis and it's still valid

☒ I'd like to complete the new Detailed Analysis (recommended)

Describe the PII you store or data you transfer

[Click here for guidance](#)

Form template's location: C:\Documents and Settings\jeffreyf\Desktop\TCAAB 03-02-2005\MPs_Comppanion_3-1-2005.doc



Describe your notice and consent experiences

 [Click here for guidance](#)

Describe how enterprises can control your feature

 [Click here for guidance](#)

Describe how users can control your feature

 [Click here for guidance](#)

Describe how you will prevent unauthorized access to PII

 [Click here for guidance](#)

5) Hold a Privacy Design Review with a Privacy SME

To avoid conflicts of interest, you must hold a design review with your Privacy SME (and LCA, if you cannot locate the Privacy SME).

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Form1 - Microsoft Office InfoPath 2003

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Describe how enterprises can control your feature

Click here for guidance

Describe how users can control your feature

Click here for guidance

Describe how you will prevent unauthorized access to PII

Click here for guidance

5) Hold a Privacy Design Review with a Privacy SME

To avoid costly mistakes, you must hold a design review with your Privacy SME (and LCA if your process Sensitive PII or target children) before you invest heavily in implementation.

6) Implement Your Compliant Design

Implement a compliant design per the [MPS](#). Consult with a Privacy SME as needed. Test privacy notice, consent, and control experiences. To ensure all Phone Home scenarios are covered, scan the code for undiscovered cases.

7) Author a Draft Privacy Disclosure

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AutoShapes

Slide 6 of 13

LCA_Summit_Template (2)

start

3:17 PM



Describe how you will prevent unauthorized access to PII

[Click here for guidance](#)

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7) Author a Draft Privacy Disclosure

The behaviors described above must be disclosed in a privacy disclosure (usually a Privacy Statement). The disclosure must be posted prior to the public distribution of your software. You are responsible for providing a draft version of the disclosure 60 days before your first public release (e.g. Beta 1). In some cases, the draft disclosure is captured in the MPS Companion form of a larger component that includes the software. Indicate whether this is the case:

- ☐ Another form includes the draft disclosure
- ☐ This form includes the draft disclosure

8) Validate Your Implementation with a Privacy SME

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Form1 - Microsoft Office InfoPath 2003

File Edit View Insert Format Tools Table Help

Type a question for help

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☐ Another form includes the draft disclosure

☐ This form includes the draft disclosure

8) Validate Your Implementation with a Privacy SME

Before your first public release update your Detailed Privacy Analysis so it reflects your implementation, hold a formal privacy review with a Privacy SME (include LCA if you process Sensitive PII or target children), and get the necessary approvals to ship.

Review and approve any changes the Privacy SME and/or LCA makes to your Privacy Disclosure.

Before each subsequent public release (e.g. Beta 2 or RTM), repeat this step for any material changes you made to your software that impact privacy.

9) Get Final Sign-off

Form template's location: C:\Documents and Settings\jeffreyf\Desktop\TCAAB-03-02-2005\MPS_Companion_3-1-2005c.xsn

Slide 6 of 13 LCA_Summit_Template (2)

start

MPS... 2 ML... 2 WL... Micros... Form1...

3:17 PM



How will the user access your public privacy disclosure?

 [Click here for guidance](#)

What does your software do?

 [Click here for guidance](#)

What user information is collected, stored, or transmitted?

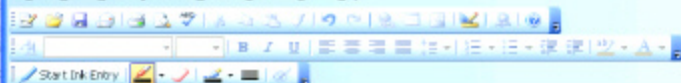
 [Click here for guidance](#)

How is the information used?

 [Click here for guidance](#)

What choice and/or control does the user have?

 [Click here for guidance](#)



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Form1 - Microsoft Office InfoPath 2003

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Type a question for help



What does your software do?

Click here for guidance

What user information is collected, stored, or transmitted?

Click here for guidance

How is the information used?

Click here for guidance

What choice and/or control does the user have?

Click here for guidance

What public information will be available to help the user?

Click here for guidance

Form template's location: C:\Documents and Settings\jeffreyf\Desktop\TCAAB03-02-2005\MPS_Companion_3-1-2005c.xsn





What does your software do?

[Click here for guidance](#)

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[Click here for guidance](#)



How is the information used?

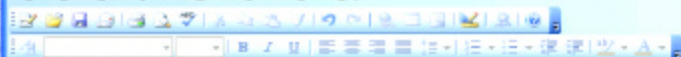
[Click here for guidance](#)

What choice and/or control does the user have?

[Click here for guidance](#)

What public information will be available to help the user?

[Click here for guidance](#)



Provide the answers you provided in the previous form(s) (if any) (or) new more information to an external customer (including the information you provide here should be written at a level that would be suitable for a typical end user (i.e. high level with all relevant privacy aspects covered). Your goal is to make the language as close to customer ready as possible. Your Privacy SME and LCA will craft an official disclosure from your answers. When the official text is ready, review it to ensure it faithfully captures your behavior.

Click here to learn about scenarios that do not need disclosure

What is the official external name of your software?

Click here for guidance

How will the user access your public privacy disclosure?

Click here for guidance

What does your software do?

Click here for guidance

What user information is collected, stored, or transmitted?

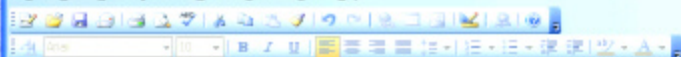
- Describe at a high level any information the software (i) collects from the user or their system, (ii) stores on the user system, and/or (iii) transfers from the user's system to another system. Indicate whether the transfer is to Microsoft or an independent third party. For example:

"Automatic Updates collects general system information from the user's computer with each visit so that they receive the updates that work best with their computer. This information may also include a Global Unique Identifier (GUID). The GUID does not contain information that can be used to identify them."

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Form1 - Microsoft Office InfoPath 2003

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Start Ink Entry

provide the answers you provided in the disclosure form. You may also want to include more information to an external customer, depending on the nature you provide here should be written at a level that would be suitable for a typical end user (i.e. high level with all relevant privacy aspects covered). Your goal is to make the language as close to customer ready as possible. Your Privacy SME and LCA will craft an official disclosure from your answers. When the official text is ready, review it to ensure it faithfully captures your behavior.

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What is the official external name of your software?

Click here for guidance

How will the user access your public privacy disclosure?

Click here for guidance

What does your software do?

Click here for guidance

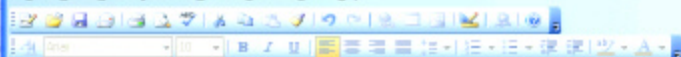
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What is the official external name of your software?

Click here for guidance

How will the user access your public privacy disclosure?

Click here for guidance

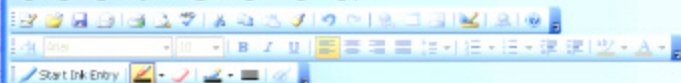
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Click here for guidance

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**What does your software do?**

Click here for guidance

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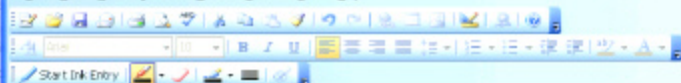
How is the information used?

Click here for guidance

What choice and/or control does the user have?

Form template's location: C:\Documents and Settings\Jeffrey\F\Desktop\TCAAB03-02-2005\MP5_Compasion_3-1-2005c.xsn





What choice and/or control does the user have?

 Click here for guidance

What public information will be available to help the user?

 Click here for guidance

8) Validate Your Implementation with a Privacy SME

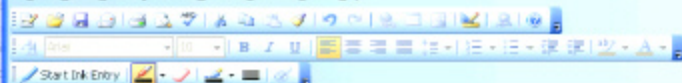
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9) Get Final Signoff

Before your final public release (e.g. RTM or RTW), complete the [Check Point Express](#) signoff process for privacy.



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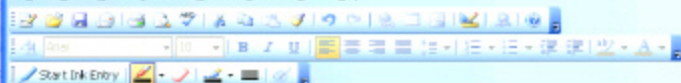
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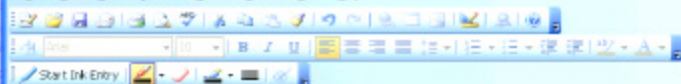
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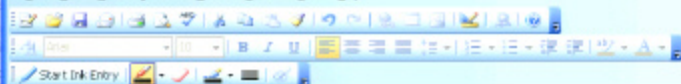
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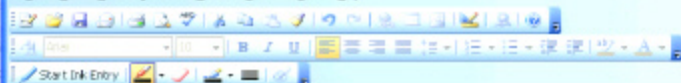
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How is the information used?

Click here for guidance

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Click here for guidance

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Form template's location: C:\Documents and Settings\jeffreyf\Desktop\TCAAB-03-02-2005\MPS_Companion_3-1-2005c.xsn

File Edit View Insert Format Tools Table Help

Type a question for help

Start Ink Entry

How is the information used?
☐ Click here for guidance

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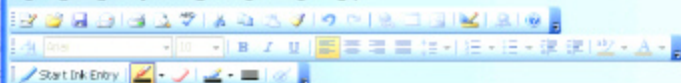
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AutoShapes

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Microsoft Office InfoPath

 Do you want to save the changes to Form1?

Yes No Cancel

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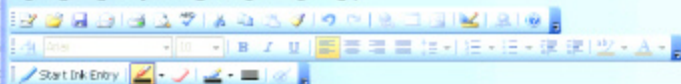
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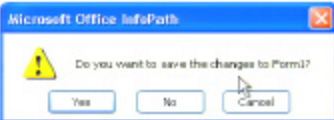
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TCAAB 03-02-2005

File Edit View Favorites Tools Help

Back Search Folders

Address C:\Documents and Settings\jeffrey\F\Desktop\TCAAB 03-02-2005

Go

File and Folder Tasks

- Rename this file
- Move this file
- Copy this file
- Publish this file to the Web
- E-mail this file
- Delete this file

Other Places

- Desktop
- My Documents
- My Computer
- My Network Places

Details



TCAAB_3-2-2005a
Microsoft PowerPoint Present...
3,073 KB



MPS_Companion_3-1-2005c
Microsoft Office InfoPath For...
25 KB

• Download required content from
• Split PPT into two slides: 10/4/1

AutoShapes

Slide 6 of 13

LCA_Summit_Template (2)

start

MPS_Com...

2 Micro...

2 Wind...

Microsoft P...

3:20 PM

TCAAB 03-02-2005

File Edit View Favorites Tools Help

Back Search Folders

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TCAAB_3-2-2005a
Microsoft PowerPoint Present...
1,075 KB



MPS_Companion_3-1-2005c
Microsoft Office InfoPath For...
25 KB

- Review required document items
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AutoShapes

Slide 6 of 13

LCA_Summit_Template (2)

start

MPS_Com...

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Microsoft P...

3:20 PM



Arial

18

B I U A A Design

New Slides

New Tools

- Initial Assessment
- Detailed Analysis
- Privacy Disclosure Template
- MPS Cookbook
- MPS Companion

Integration Timing

- SDG on 6 month refresh cycle
- Looked at March deadline
- Responding: Note your time and get it right
- Will deploy first with Longhorn
- Jump on the next SDG train

Longhorn Exit Criteria

- Integration and end of operations
- Available training resources (e.g. privacy team) and weapons (i.e. measurable evidence)
- Impacting system to:
- Define analysis scenarios
- Create document
- Implement scenarios
- Working on this now
- Team working on this
- Split PI into two risk classes: 10/11

New Tools

- Initial Assessment
 - New scenarios, better instructions
- Detailed Analysis
 - More relevant, much easier to complete
- Privacy Disclosure Template
 - Draft "customer ready" language
- MPS Cookbook
 - Scenarios, rules, guidance, examples
- MPS Companion
 - Optimal work flow, end to end

March 3, 2008

Microsoft Confidential

Click to add notes



Slide 6 of 13

LCA_Summit_Template (2)

Integration Timing

- SDL on 6 month refresh cycle
- Looked at March deadline
- Resounding “take your time and get it right”
- Will deploy first with Longhorn
 - Integrate MPS and tools into the basic
- Jump on the next SDL train
 - Dovetail process, refresh tools

Longhorn Exit Criteria

- It's a gauntlet – not a set of aspirations
- Must be based on existing resources (e.g. privacy team) and weapons (i.e. measurable methods):
 - Impact Rating completed
 - Detailed Analysis completed
 - Draft Disclosure submitted
 - UX reviewed (by privacy team)
 - Missing controls implemented
 - Disclosure signoff (by development team)
- Split P1 into two risk classes: E0/E1

M9 Exit Criteria

- **100% Feature Groups have:**
 - **Assessed Privacy Impact Rating**
- **100% P1/E0, 90% P1/E1, 80% P2 have:**
 - **Completed a Detailed Analysis**
 - **Submitted a Draft Privacy Disclosure**
- **100% P1/E0 have:**
 - **Passed a Privacy Review to ensure the UX is compliant with MPS**

Improving Compliance

- **More Privacy People:**
 - **Scale up manual tasks**
 - **% of design reviewed**
- **Better Tools:**
 - **Improve quality of code scan**
 - **Add packet sniffing for specific scenarios**
 - **Add data tagging and data flow analysis for privacy.**

Q&A



